

U.S. District Court For Massachusetts
Eastern Division

Docket # CV 12316 WGY

URGENT — MOTION FOR 90 DAY CONTINUANCE

I, Kevin P. Loughman, Plaintiff Pro Se, do hereby
motion this honorable court that required actions
under Federal Rules of Civil Procedure should be deferred or
allowed under a 90-Day Continuance. The Plaintiff
averts to the Court that he is temporarily
hospitalized in London, England, and awaiting
Open Heart Surgery - for replacement of AORTIC
Valve and Coronary Artery By-pass. A Copy of
Medical Surgical Assessment Accompanies this
Motion. Anticipate 60-90 Day Recovery Period, Post-Op

Respectfully Submitted,

Kevin P. Loughman -KEVIN P. LOUGHMAN PRO-SE
Dec 3, 2004

University College London Hospitals **NHS**
NHS Foundation Trust

Dr Vivek Sivaraman MBBS
SHO to Dr RH Swanton

Cardiac Services Directorate
The Heart Hospital Westmoreland Street
London, W1G 8PH

Telephone: (020) 7573 8888
Bleep 2264

1st December 2004

E-mail: Vivek.Sivaraman@uclh.org

To Whom It May Concern

This is to confirm that Mr Kevin Loughman DOB 14/01/1945 was admitted to the University College Hospital emergency department with shortness of breath. He was subsequently diagnosed with stenosis of the aortic valve, which needs to be replaced.

He was initially attended to by the emergency and acute care physicians, and care was subsequently transferred to the consultant cardiologist, Dr Howard Swanton, at The Heart Hospital. He will undergo an aortic valve replacement under the cardio-thoracic surgeons.

The date of the surgery has not been fixed yet but Mr Loughman will not be able to travel before atleast days after the surgery.

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Any further queries may be directed the email address given in the letterhead or directly to the consultant through his secretary.



Dr Vivek Sivaraman

The Heart Hospital
16-18 Westmoreland Street
London W1M 8TH



CERTIFICATE OF SERVICE

I, Kerin P. Loughman, hereby certify that on December 3, 2004 I served the above document upon Counsel Krista Prett for Defendants Maura Mahoney-Lotus Development (IBM) and upon Counsel Shireen Arani for Defendants Maura Fedey-First Security Services Corporation — at their respective addresses in Boston, Mass. U.S.A.

Notice was sent pre-paid from the Heart Hospital,
16-18 WESTMORELAND ST. LONDON W1G 8HP U.K.

Kerin P. Loughman, Kerin P. Loughman,
Pro. se

Dec 3, 2004